



RE: Harberton Parish SEA: Scoping Report consultation (Monday 13th March - Monday 17th April)

1 message

Putt, Ryan [REDACTED]
To: Harberton Parish Clerk <clerk@harbertonparishcouncil.org>
Cc: "Baker, Emily" [REDACTED]

13 March 2023 at 09:36

Morning Cat,

As you will have seen, we have now circulated the SEA Scoping Report with the consultees for their comment.

Please find attached a summary of how we have addressed the comments and suggestions within the updated report, for your records. We would like to thank the group for providing some really useful locally specific details for inclusion, and we've been able to readily reflect these changes within the report.

There were a few comments which relate to possible policy directions for the Neighbourhood Plan. We will be undertaking an appraisal of Neighbourhood Plan policies through the next stages of the SEA, with a view to concluding on how the plan performs in relation to each of our SEA themes. In this respect, we have highlighted where this might be the case.

Our site assessment team have asked if we can undertake some site visits next week, with a view to qualifying some of their baseline information which they've obtained to date, and to take some photos. This will be on 22nd April, which I believe is when you might be meeting with Simon in our design team? We will be viewing the sites from public rights of way, and are happy to complete these ourselves. However, if you would like to accompany us on the visits this is absolutely fine. Otherwise, we will be in touch shortly after the close of the SEA Scoping consultation to discuss the next steps for the SEA.

If you have any questions in the meantime, do let us know.

Best regards,

Ryan

From: Baker, Emily [REDACTED]
Sent: 13 March 2023 09:17
To: consultations@naturalengland.org.uk; Enquiries, Unit <enquiries@environment-agency.gov.uk>; southwest@historicengland.org.uk
Cc: Putt, Ryan [REDACTED] Harberton Parish Clerk <clerk@harbertonparishcouncil.org>
Subject: Harberton Parish SEA: Scoping Report consultation (Monday 13th March - Monday 17th April)

Good morning,

The Harberton Parish Council is currently preparing a Neighbourhood Plan for the designated neighbourhood area in South Hams, Devon. To accompany the development of the neighbourhood plan, a Strategic Environmental Assessment (SEA) is currently being undertaken to inform and influence the plan-making process.

A Scoping Report has now been prepared for the SEA.

On this basis, please find attached the Harberton Parish Neighbourhood Plan Scoping Report for your comment. Consultees are invited to comment on the need for SEA and the content of this Scoping Report, in particular the evidence base for the SEA, the identified key issues and the proposed SEA framework.

The consultation period will begin today (Monday 13th March 2023) and will end on Monday 17th April 2023. This incorporates the statutory five week period for scoping consultation. Please return any comments to this email address.

We look forward to receiving your response. In the meantime, if you have any questions on the SEA process currently being carried out for the Harberton Parish Neighbourhood Plan, please do not hesitate to get in touch.

Kind regards,

Emily

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She/Her

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Harberton Parish SEA Scoping report feedback and amendments table.docx

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Harberton Parish SEA Scoping report

Neighbourhood Plan Steering Group notes and comments

Comment location	Comment	AECOM response
Title Page	Always refer to Harberton 'PARISH' Neighbourhood Plan (as Harberton Parish includes villages of Harberton and Harbertonford. Without including the word 'Parish' there is confusion that the plan is only for the village of Harberton.	Amended. We will also reflect this within our SEA Environmental Report.
Table of contents	Transportation has no page number--it's listed as 0	Amended.
Header (on all pages)	Insert word 'Parish'. (Harberton Parish Neighbourhood Plan)	Amended. As per above comment.
1.1	Insert word 'Parish'. (Harberton Parish Neighbourhood Plan)	Amended. As per above comment.
1.6 title	Insert word 'Parish'. (Harberton Parish Neighbourhood Plan)	Amended. As per above comment.
2.11	As the main source of pollution is deemed to be car pollution, this would be another opportunity to bring forward the ideas of creating an EV charging network within the village & definitely in any new housing developments. A tree & hedge planting plan could be mentioned here as well as in the biodiversity section.	Added in the point about EV charging networks to the supporting assessment questions. Tree and hedge planting is included as green infrastructure.
2.3	2.3 Air Quality Needs to mention that there is no mains gas supply in the village of Harberton so smoke from heating (coal, wood etc is likely to be higher). Also bonfires need to be controlled somehow as the village is often very polluted.	Many thanks for the locally specific baseline information. We have reflected this within the report.
2.4	Three references to 'Harberton' – needs to refer to Harberton Parish.	Amended. As per above comment.
3.9	Insert 'Parish' when referring to the neighbourhood area, and propose referring to 'Harberton village settlement'.	Amended. As per above comment.
4	Energy production (new heading) A member of the steering group proposes that this scoping document misses the opportunity to discuss energy production. "Needs a section on Windturbines, Solar PV, Biomass or whatever other means of local energy production should be considered	The SEA process will consider how Neighbourhood Plan policies address the climate crisis. In this respect, if the Neighbourhood Plan seeks to support opportunities for renewable energy production within the neighbourhood area, the SEA will likely conclude that the

	<p>.... and where they could/should be located. I feel this needs to be brought into the open for a good airing. Currently it's buried in the waffle”.</p> <p>Another member comments In this section it could similarly be good to go into more detail about reducing energy waste. At present it just says <i>“Increase the number of new developments meeting or exceeding sustainable design criteria?”</i> It would good to be more specific perhaps referring to preference being given to housing developments with higher sustainability standards, passiv house levels of insulation, viably useful & effective roof top solar pv & low carbon heating technology (- especially ground source heat pumps.)</p> <p>It would also be good to offer support for retrofitting & insulating old houses.</p>	<p>Neighbourhood Plan performs favourably with respect to the climate change SEA theme.</p> <p>Reference to Passiv House standards, roof top solar panels and low carbon heating technology has been added to the supporting assessment question ‘Increase the number of new developments meeting or exceeding sustainable design criteria’.</p>
4.13	Propose replace last phrase with "While some increases are considered likely with or without the HNP, a design code associated with the HNP offers an opportunity to encourage development that minimises them."	Amended.
4.14	<p>Add to first bullet: Harberton Parish Council has also declared a climate emergency in response to the concerns of the local community, which are also reflected in the recent establishment of Sustainable Harbourne Valley, the environmental action group for the parish.</p> <p>https://www.sustainableharbournevalley.org.uk/</p>	Amended.
4.14	Add to third bullet: The HNP can also influence design features of individual developments so as to minimise emissions involved both in the construction and ongoing operation.	Amended.
4.16	There needs to be mention of further flood protection plans. According to our local new bulletin, the Harbourne flooded at some point in Jan/Feb for the first time since the new flood protection scheme was installed. With the predicted increased precipitation levels over the next few decades, I would suggest that not only do we definitely want to inhibit new builds	This has been added under the ‘Future baseline’ heading and the ‘Key issues’ heading.

	from happening in flood plains (or new unforeseen run off pathways being created from any new developments) but that there should be plans for further flood protection plans & upgrades.	
5	Community Well-Being AECOM did not use it's own recent HNA as a policy document to refer to...why not?	The HNA has been referenced and information added into the report.
5.4	<i>Comment relating to HNA and census: I see the numbers on population have been updated to 2021 Census, which is great. Maybe we can use some of those to update the HNA with an addendum?</i>	The HNA will be a useful source of evidence during the subsequent stages of the SEA process.
5.4	Insert 'Parish' (Harberton Parish neighbourhood area)	Amended. As per comment above.
5.5	Insert 'Parish' (Harberton Parish neighbourhood area) – TWICE here.	Amended. As per comment above.
5.8	Insert 'Parish' (Harberton Parish neighbourhood area)	Amended. As per comment above.
5.8	A query re understanding of the Indices of Multiple Deprivation data: <i>"I don't well-understand the seeming contradiction of the Parish being in the 50% least deprived communities in England and simultaneously the 20% most deprived for barriers and 10% most 'poor'. It seems from the language that we are in the TOP 20% and TOP 10% respectively of these categories. Can this language be clarified please? I think the language is meaning to point out we are in the 50% least deprived, and within that percentile, the 20% most deprived on Barriers and 10% most deprived on Environment. Or is it something else? Or is it a double negative? 50% least deprived overall means we are in the top 50 percentile of the nation on resourced and so 20% of that on Barriers means we are 80% without barriers. I hope you can see what I mean 'deprived' is a negative and 'barriers' and 'poor' are negatives. So double negative sentences are not the clearest in the language available."</i>	The 'overall' Index of Multiple Deprivation (IMD) scoring for the neighbourhood area is an average of the various sub-domains which form part of the IMD. In this respect, Harberton Parish sits within the 50% least deprived category – this is concluded through averaging out the different deprivation domains. There might be differences between the sub-domain categories – which provides an opportunity for the IMD to highlight any particular categories in which the neighbourhood area might be more deprived or less deprived.
	And another question/comment re interpretation of this data: <i>how can it be that this beautiful rural area is in the 10% most deprived areas for "living environment"? Can this be right?</i>	The Living Environment deprivation domain considers the quality of both the local environment and is "categorised into 'indoors living environment' to measure the quality of housing and 'outdoors living environment' to measure indicators like air quality and road traffic accidents."

5.9	When making the statement ‘this suggests the population of Harberton are relatively well off’ do you mean the village of Harberton or Harberton Parish? The villages would appear to be different – with traditionally more social housing in Harbertonford (before ‘right to buy’) and a number of social housing properties for elderly people. Do the statements made within this para tally with the HNA?	Text has been removed.
5.10	Do you mean Harberton Village or Harberton Parish? The villages of Harberton and Harbertonford have traditional differences and I would expect (without having undertaken any research mind) house prices in Harberton to be greater than in Harbertonford.	Amended.
5.12	Which year? Typo, data is not complete---. '202'.	Amended.
5.15	When referring to Harberton, do you mean Harberton Parish or Harberton village?	Amended.
5.17	If the para is referring to Harberton Parish, please insert word ‘Parish’.	Amended.
5.18	If the para is referring to Harberton Parish, please insert word ‘Parish’.	Amended.
5.19	Old Parsonage has not been a B&B for over two years--now a family home.	Thanks for updating us – this has been removed.
5.19	Members of the committee suggest also including: <ul style="list-style-type: none"> • Nkuku--a busy lifestyle warehouse/cafe/online empire/employer of some locals. • gathering public spaces for both villages--H'fd has it's green and H'tn people gather in Harberton Square (by Church House Inn and by entrance gateway to St Andrew's Church) 	These have been added in.
5.21	'Marl Park' is name of area of housing. (A street). The park adjacent to the primary school is referred to as 'Harbertonford Park' or 'Harbertonford Play Park'.	Marl Park has been removed and Harbertonford Play Park has been added in.
5.21	Members of the committee suggest also including: <ul style="list-style-type: none"> • allotments: Harbertonford's are sizeable (near Hernaford). Harberton has allotments next to the Vicarage. • Nkuku--a busy lifestyle warehouse/cafe/online empire/employer of some locals. 	Allotments have been added to the green space list and Nkuku has been added to community facilities.

	<ul style="list-style-type: none"> new planted orchard (H'fd) – <i>CR thinks this might refer to planting of some fruit trees within Harbertonford Play Park.</i> 	
5.26	Insert 'Parish' (Harberton Parish neighbourhood area)	Amended.
6.10	Insert 'Parish' (Harberton Parish neighbourhood area)	Amended.
6.12	Interested why Sharpham so prominently featured when outside the Parish?	
6.20	Bullet point 2: Insert 'Parish' (Harberton Parish neighbourhood area)	Amended.
6.22	<p>A member of the committee comments: <i>The suggestion to “Conserve and enhance buildings, structures, and areas of architectural or historic interest, both designated and non-designated, and their settings” is potentially fraught with problems. There is an inherent conflict between conservation planning regulations that aim to preserve the look of buildings (often to the times between the 1950s & 1970s when those planning regulations were brought in – which ignores the rich history of constant upgrades that those buildings had before that time) & the recent understanding & legislation that is aimed at reducing building energy waste and increasing home energy generation options in an aim to reach the country’s net zero aims. This conflict often leads to planning blocks that are really unhelpful. To this end I would not encourage broadening this to “non-designated” buildings & would even look for ways to word the document to give priority to planning applications that support any shifts to low carbon buildings & living.</i></p>	<p>Historic England will expect to see the consideration of non-designated heritage features through the SEA process.</p> <p>The SEA process, through our consideration of reasonable alternatives work, shall provide an overview of the sustainability trade-offs associated with different options, so the group can consider whether to focus attention on climate factors or heritage factors in their decision making.</p>
7.12	Insert 'Parish' (Harberton Parish neighbourhood area)	Amended.
7.13	Insert 'Parish' (Harberton Parish neighbourhood area)	Amended.
7.17	<p>'Sustainable Harbourne Valley' has been carrying out water quality monitoring under the auspices of the Westcountry Rivers Trust Citizen Science Investigations project, along the Harbourne river for an extended period & have consistently found the water to be contaminated. This is most probably as a result of waste water discharge both from private homes & the local water authority. It would be really helpful to have some strong wording to support greater restrictions on such discharges, & stringent restrictions on any new housing developments that require effective, high standard environmental waste management systems to be integrated into any new building</p>	<p>We have added in the information about water quality testing. We have supporting assessment questions to avoid negative impacts on water quality, provide drainage and support improvements to the water system.</p> <p>The SEA will consider the potential impacts to land, soil, and water resources as associated with the Neighbourhood Plan's policies and proposals. We will consider policy wording, and likely conclude that there</p>

	<p>developments. (It might also be helpful to have a clear system for taking active legal actions against the water authority when it is found to be breaching its permit & breaking the law).</p> <p>https://www.sustainableharbournevalley.org.uk/</p>	will be positive effects through encouraging new development proposals to consider appropriate water management solutions through design.
8.4	Insert 'Parish' (Harberton Parish neighbourhood area)	Amended.
8.10	Insert 'Parish' (Harberton Parish neighbourhood area)	Amended.
8.13	Insert 'Parish' (Harberton Parish neighbourhood area)	Amended.
8.17	1 st bullet, Insert 'Parish' (Harberton Parish neighbourhood area)	Amended.
9	9 Transport Road safety needs a particular focus, rather than just 'access for all'.	Improve road safety is a supporting assessment question for the SEA objective.
9.5	When referencing 'Harberton' is the village of Harberton or Harberton Parish meant?	Amended.
9.7	<p>Response to question: <i>Are residents more likely to travel by car or by bus to access the train station?</i></p> <p>Neither the Parish Council nor the Neighbourhood Planning group has any recent data that would enable a confident response to this question. It would be a guess. Based on bus timetables I would assume that it would be difficult to use the bus service if commuting by rail. The 2015 survey undertaken by the Neighbourhood Plan committee asked a question about use of the bus service:</p> <p>Q10 Do you use the local bus service? 135 respondents said yes. 238 respondents said no.</p> <p>Q11 would you use it if it were more frequent? 195 respondents said yes, 153 respondents said no.</p> <p>https://www.harbertonparishcouncil.org/wp-content/uploads/2020/10/2015-HNP-Consulation-Questionnaire-All-Responses.pdf</p>	Thanks for providing this information. We have added this into the bus services section of this chapter.
9.8	Insert 'Parish' (Harberton Parish neighbourhood area)	Amended.

	<p>first bullet. A member of the committee comments that there are two buses per day out of Harberton before 10:20, one back at 13:15 and another at the end of the school day. Maybe also mention request stops anywhere on A381 (and passengers can walk into the village). Maybe some one-way systems could be considered? i.e. road past Dundry has a deadly exit onto A381. Hill-start and very limited visibility.</p>	We have updated to reflect the bus times and the request stop service.
	<p>A committee member queried whether the local charity 'Bob the Bus' is still operating in the Parish. The service was operating in the village, but stopped due to timetables being too similar to the County bus service and lack of use. https://bobthebus.org.uk/timetables/</p>	This has been included.
9.11	<p>IN addition to comments about concerns about road safety of A381 in Harbertonford, that for Harberton residents the three exits from Harberton village onto the A381 are high risk. Especially the road past Dundry (Langridge Cross) is a hill start with limited visibility.</p>	Added in.
	<p>The A381 is noted to be a threat to safety in the traffic section. It is also a threat to health due to the increased air pollution that is found directly next to busy roads. (See Air Quality section)</p>	Added into the air quality chapter.
9.13	<p>Insert 'Parish' (Harberton Parish neighbourhood area)</p>	Amended.
9.14	<p>Insert 'Parish' (Harberton Parish neighbourhood area) TWICE in this para</p>	Amended.
9.14	<p>Whilst there are a small number of footpaths in the Parish, there are a higher number of green lanes used for recreation that are managed and maintained by the County Council. At least one of these connects the two villages of Harberton and Harbertonford. Green lanes are in various states of repair and not always easily used (some are deeply rutted through use by motocross bikes and others are waterlogged or severely eroded) There is a green lane that provides an 'off road' route to Totnes, however would be very difficult to use by bicycle due to erosion.</p>	This has been added into the baseline.
9.16	<p>Insert 'Parish' (Harberton Parish neighbourhood area)</p>	Amended.
9.19	<p>Insert 'Parish' (Harberton Parish neighbourhood area) TWICE in the first bullet point and once in the second bullet point.</p>	Amended.
9.19	<p>Response to query in final bullet point of 'Key Issues': Can we confirm the following statement:</p>	Thanks for responded. I have reworded the statement.

	<ul style="list-style-type: none"> The recovery from the COVID-19 pandemic has led to changing travel patterns, most notably resulting from increased levels of working from home. <p>Neither the Parish Council nor the Neighbourhood Plan committee has any data on this. I can only suggest a review of the traffic data available on the Harbertonford Community website, showing studies on speed and weight of traffic in the period 23-Jul-2020 to 2-Aug-2020 (~10 days) and from 21-Sep-2021 to 1-Oct-2021 (~10 days), but can't offer any further insights as to why there might be a change of traffic patterns. The survey undertaken in August will be impacted by summer holiday traffic, which in the South Hams, is significant.</p> <p>https://harbertonford.com/projects/a381/</p>	
9.21	<p>9.21 This section could also include the suggestion of:</p> <ul style="list-style-type: none"> The <u>rapid</u> development of an EV charging network (no new petrol/diesel cars will be sold in the UK after 2030, so we need to be prepared for the massive shift to electric powered vehicles). Ways to slow down vehicles & improve the safety on roads used by people & vehicles. Perhaps support village lift share programs. 	<p>Electric vehicle charging points have been added to the supporting assessment question about shifting to more sustainable travel forms. The supporting question around improving road safety includes measures like traffic slowing. I have added an additional question to encourage proposals to measure progress when schemes come forward.</p>

Further comments on energy

Energy

Remarkably the Climate Change section seems to be the only section that refers to the need for renewable energy development but does not go into much detail - "*Generate energy from low or zero carbon sources, or reduce energy consumption from non-renewable resources?*".

This is a huge topic & as Peter suggested requires a sub section of its own. It is inevitable that we will need to be developing local sources of renewable, clean energy – the UK is committed to being net zero by 2050 & recent changes in energy prices due to world instability have

shown us how vulnerable we can be. We particularly need to be considering protection for the ever increasing part of our community that is going into fuel poverty.

Renewables now account for over one third of electricity generation, but overall demand for electricity is likely to double by 2050, if not sooner because of the electrification of cars and vans and the increased use of clean electricity replacing gas & oil for heating. As such, we will need to be producing 4 x as much electricity as we do now by 2050!

The renewable energy sector (solar, wind turbines, hydro-electric & anaerobic digestion – but not biomass, as this negatively impacts air quality & has been shown to cause many more problems) will have to expand at a phenomenal rate. The way that this is being developed is to have many more local sources of renewable energy creation across the UK that reduces energy transport waste & builds local energy security. This will undoubtedly be required to occur in our local vicinity too.

Within a section on renewable energy, it would be great to actually give preference to community energy projects, as these are designed to help local people with reducing their energy costs & also have community benefit funds that can financially support the community in numerous ways. They would keep money in the local economy & be far more supportive for the whole community in many ways.

An essential part of the implementation of any renewable energy project would also be the necessity for massive community engagement, so that appropriate sites can be found that do not negatively impact but are to the advantage of the whole community. I am aware that plans for previous renewable energy projects have caused distress & splits in the community, probably due to a lack of engagement & proper consideration for all members of the community. As it will be essential & necessary in the very near future to develop more local renewable energy resources, we need to be proactive about putting this in the plan & engaging properly with our community. This may also enable us to start mapping potential sites that would be efficient & agreeable.

In this section it could similarly be good to go into more detail about reducing energy waste. At present it just says "*Increase the number of new developments meeting or exceeding sustainable design criteria?*" It would good to be more specific perhaps referring to preference being given to housing developments with higher sustainability standards, passiv house levels of insulation, viably useful & effective roof top solar pv & low carbon heating technology (- especially ground source heat pumps.)

It would also be good to offer support for retrofitting & insulating old houses.